

J.G. Harrington
T: +1 202 776 2818
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REDACTED FOR PUBLIC INSPECTION

June 22, 2015

VIA HAND DELIVERY

Accepted / Filed

Marlene H. Dortch, Esquire
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

JUN 22 2015

Federal Communications Commission
Office of the Secretary

Re: Cox Communications, Inc. and Its Affiliates
WC Docket Nos. 10-90 and 11-42
2015 Form 481 Filings
Request for Confidentiality

Dear Ms. Dortch:

Cox Communications, Inc. (Cox), by its attorney and pursuant to Section 0.459 of the Commission's rules,¹ hereby requests that the Commission afford confidential treatment to designated portions of the attached Form 481 reports being filed on behalf of affiliates of Cox. The confidential version of this submission is being filed with the Secretary's Office and the public version is being filed with the Secretary's Office and via ECFS.

This request is limited to specific information relating to unfulfilled service requests, customer complaints and outages contained in three of the fourteen reports being filed by Cox.² Cox requests confidentiality on two grounds. First, the information contained in these exhibits is commercially sensitive to Cox. The reports include specific information on the number of times Cox denied service to customers and how it determines when it can provide service, how often customers complained and the origins, extents and resolution of service outages. This

¹ 47 C.F.R. § 0.459.

² The affected reports concern Cox Georgia Telcom, LLC, Cox Louisiana Telcom, LLC and Cox Oklahoma Telcom, LLC. The confidential information is in lines 300 and 410; in the attachment concerning Cox's process for considering service requests; and in the table on page 15 of the reports of the reports for each of these entities.

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information would be valuable to competitors that could use it in devising marketing plans and other competitive responses to Cox. As a consequence, Cox does not release any of this information to the public and takes specific steps to maintain the security of this information within the company.

Second, this information already is treated as confidential by the other entities receiving it, including the Universal Service Administrative Company and the relevant state regulators. Disclosure of this information would affect the other entities' ability to obtain relevant data from the companies they regulate because they would know any data they filed would be subject to disclosure at the Commission. Further, outage data already is treated as confidential by the Commission when it is submitted to the Commission's Network Outage Reporting System.

Each of these grounds is sufficient under Section 0.457(d) of the Commission's rules³ to maintain the confidentiality of the designated section of the Section 54.313 report. For these reasons, Cox requests that the Commission maintain the confidentiality of the designated section of Cox's Section 54.313 report.

Please inform me if any questions should arise in connection with this request.

Respectfully submitted,



J.G. Harrington

Counsel to Cox Communications

³ 47 C.F.R. § 0.457(d).

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Federal Communications Commission
Office of the Secretary

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: Cox Communications, Inc. and Its Affiliates
WC Docket Nos. 10-90 11-42 and 14-58
2015 Form 481 Filings**

Dear Ms. Dortch:

Pursuant to Sections 54.313 and 54.422 of the Commission's rules Cox Communications, Inc. ("Cox"), by its attorney, hereby submits its Form 481 reports for 2015 for the affiliates listed below.

Filings are being submitted on behalf of the following entities:

- Cox Arizona Telcom, LLC (SPIN 143014467, SAC 459012)
- Cox Arkansas Telcom, LLC (SPIN 143022568, SAC 409029)
- Cox California Telcom, LLC (SPIN 143000014, SAC 549017)
- Cox Connecticut Telcom, LLC (SPIN 143016029, SAC 139001)
- Cox Florida Telcom LP (SPIN 143002897, SAC 219019)
- Cox Georgia Telcom, LLC (SPIN 143008929, SAC 229011)
- Cox Iowa Telcom, LLC (SPIN 143018824, SAC 359019)
- Cox Kansas Telcom, LLC (SPIN 143006715, SAC 419021)
- Cox Louisiana Telcom, LLC (SPIN 143016765, SAC 279011)
- Cox Nebraska Telcom II, LLC (SPIN 143015410, SAC 379001)
- Cox Nevada Telcom, LLC (SPIN 143017743, SAC 559017)

Cooley_{LLP}

Marlene H. Dortch

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- Cox Oklahoma Telcom, LLC (SPIN 143005575 SAC 439003)
- Cox Rhode Island Telcom, LLC (SPIN 143017674, SAC 589001)
- Cox Virginia Telcom, LLC (SPIN 143000013, SAC 199018)

These filings were submitted to the Universal Service Administrative Company via electronic filing on June 10, 2015 and will be submitted to the state regulators in the other states served by these companies on or before July 1, 2015 or per applicable local rule.

Please inform me if any questions should arise in connection with this submission.

Respectfully submitted,



J.G. Harrington

Counsel to Cox Communications, Inc.

Attachments (14)

<010> Study Area Code	199018	Accepted / Filed
<015> Study Area Name	Cox Virginia Telcom LLC	
<020> Program Year	2016	JUN 22 2015
<030> Contact Name: Person USAC should contact with questions about this data	Paul Cain	Federal Communications Commission Office of the Secretary
<035> Contact Telephone Number: Number of the person identified in data line <030>	4042698139 ext.	
<039> Contact Email Address: Email of the person identified in data line <030>	paul.cain@cox.com	

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
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		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> ← check box if no outages to report		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	(attached descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	(attached descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

<2000>	Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>		(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>		(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>		(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

199018

Cox Virginia Telcom LLC

2016

Subject regarding this data

Paul Cain

Person identified in data line <030>

4042698139 ext.

Person identified in data line <030>

paul.cain@cox.com

Information from the FCC?

(yes / no)

Do you have an existing §54.202(a) "5

(yes / no)

Are you required to file a progress report pursuant to 47 C.F.R. § 54.313(a)(1) of your company's existing § 54.202(a) "5, as it relates to your provision of

service under the current Plan or, in subsequent years, pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a small business, your progress report is only required if you are a small business.

Name of Attached Document

Do you have a plan (Yes, No, Not Applicable) to confirm that your plan contains a progress report on its five-year anniversary pursuant to §54.202(a). The information shall be redacted or blocked as appropriate.

- plan targets
- support was received
- quality and how support was used to improve service quality
- coverage and how support was used to improve service coverage
- capacity and how support was used to improve service capacity
- performance targets not met

(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	199018
<015> Study Area Name	Cox Virginia Telcom LLC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Paul Cain
<035> Contact Telephone Number - Number of person identified in data line <030>	4042698139 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	paul.cain@cox.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

(1100) No Terrestrial Backhaul Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	199018
<015> Study Area Name	Cox Virginia Telcom LLC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Paul Cain
<035> Contact Telephone Number - Number of person identified in data line <030>	4042698139 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	paul.cain@cox.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	199018
<015> Study Area Name	Cox Virginia Telcom LLC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Paul Cain
<035> Contact Telephone Number - Number of person identified in data line <030>	4042698139 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	paul.cain@cox.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans



Name of Attached Document

<1220> Link to Public Website

HTTP <http://www.cox.com/residential/phone/lifeline.cox>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	
<015>	Study Area Name	199018
<020>	Program Year	Cox Virginia Telecom LLC
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	PAUL CAIN
<039>	Contact Email Address - Email Address of person identified in data line <030>	4042898159 ext.
		paul.cain@cox.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
- <2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

<010> Study Area Code	199018
<015> Study Area Name	Cox Virginia Telcom LLC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Paul Cain
<035> Contact Telephone Number - Number of person identified in data line <030>	4042698139 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	paul.cain@cox.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No)

(3014) If yes, does your company file the RUS annual report

(Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited?

(Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

<010> Study Area Code	199018
<015> Study Area Name	Cox Virginia Telcom LLC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Paul Cain
<035> Contact Telephone Number - Number of person identified in data line <030>	4042698139 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	paul.cain@cox.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	199018
<015> Study Area Name	Cox Virginia Telcom LLC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Paul Cain
<035> Contact Telephone Number - Number of person identified in data line <030>	4042698139 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	paul.cain@cox.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	Cox Virginia Telcom LLC
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/10/2015
Printed name of Authorized Officer:	Joiava Philpott
Title or position of Authorized Officer:	VP, Regulatory Affairs
Telephone number of Authorized Officer:	4042690983 ext.
Study Area Code of Reporting Carrier:	199018 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	199018
<015> Study Area Name	Cox Virginia Telcom LLC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Paul Cain
<035> Contact Telephone Number - Number of person identified in data line <030>	4042698139 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	paul.cain@cox.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments